

II. WRITTEN COMMENTS AND RESPONSES - AGENCY

DEPARTMENT OF TRANSPORTATION

BOX 23660

OAKLAND, CA 94623-0660

(510) 286-4444

TDD (510) 286-4454



January 12, 1994

SM-82-22.43
SCH: 93121003
SM082146

Mr. Malcolm C. Carpenter, City Planner
Town of Colma
1198 El Camino Real
Colma, CA 94014

Re: Draft Environmental Impact Report (DEIR): Colma Cardrooms. Four cardroom applications for four (4) separate sites; one of the sites will be selected for implementation. Project sites are near State Route (SR) 82, El Camino Real.

Dear Mr. Carpenter:

Thank you for including the California State Department of Transportation (Caltrans) in the environmental review process. We have reviewed the above referenced draft and forward the following comments:

1. The proposed mitigation measure of changing the signal phasing and timing at the intersection of Serramonte Boulevard and Junipero Serra Boulevard will require that the intersection be widened to accommodate the overlapping left turn movements. The DEIR does not address the widening issue. Please clarify. **A1**

2. For sites B or C, the PM peak hour traffic volume on northbound SR 82 right turns will increase by 39% and 54%, respectively. Will there be any provision for a new right turn lane to accommodate the additional traffic generated by the project? **A2**

Also, for sites B or C, the PM peak hour traffic volume on westbound Serramonte Boulevard left turns will increase by 42% and 45%, respectively. Will there be any provision for a new left turn lane to accommodate the additional traffic? **A3**

3. It is more likely that because of the nature of this project, the peak hour traffic periods for this project would occur on weekends, perhaps between Friday and Sunday. Therefore, the weekday trip generation data presented in the DEIR may not be valid and may be quite low. Please clarify. **A4**

4. We strongly suggest that the project proponent participates in a traffic

mitigation fee program to pay for or share in the costs of all traffic improvements required as a result of the project or the city may consider creating an assessment district to collect transportation improvement fees.

A5

5. Any work performed within the State right-of-way will require an encroachment permit from Caltrans. A completed application, environmental documentation, and five sets of maps should be submitted to the following address:

A6

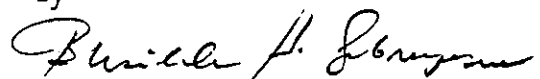
Mr. Bob Cashion, Chief
Caltrans District 4
Maintenance - Permits
P. O. Box 23660
Oakland, CA 94623-0660

We appreciate the opportunity to work with you on this project and wish to continue close correspondence on any new developments. Should you have any questions regarding these comments, please contact Salimah As-Sabur of my staff at (510) 286-5583.

Sincerely,

JOE BROWNE
District Director

by


BLESILDA H. GEBREYESUS
Senior Transportation Planner

cc: Mark Goss, SCH
Craig Goldblatt, MTC
Patricia Perry, ABAG

CALIFORNIA DEPARTMENT OF TRANSPORTATION

Response

- A1. Because the current lane configuration on Serramonte Boulevard approaches at its intersection with Junipero Serra Boulevard has exclusive left-turn lanes (i.e., there are no lanes shared by left-turning and through vehicles), there would be no need for intersection widening.
- A2. The commenter does not identify the intersections at which the stated traffic increases would occur, but it is assumed that the commenter is referring to the intersection of El Camino Real and Serramonte Boulevard. The proposed project would increase p.m. peak-hour right turns on northbound El Camino Real at Serramonte Boulevard by 46 vehicles (+31 percent) if the cardroom were located at Site B and by 62 vehicles (+41 percent) if located at Site C. The percentage increases given in the comment appear to be cumulative increases from the existing number of right turns. The p.m. peak-hour level of service (LOS) would be an acceptable LOS D or better under the alternate sites, and there would not be a need for a new right-turn lane.
- A3. The proposed project would increase p.m. peak-hour left turns on westbound Serramonte Boulevard at El Camino Real by 45 vehicles (+28 percent) if the cardroom were located at Site B and by 54 vehicles (+33 percent) if located at Site C. As stated above, the percentage increases given in the comment appear to be cumulative increases from the existing number of right turns, and because the p.m. peak-hour service level would be an acceptable LOS D or better under the alternate sites, and there would not be a need for a new left-turn lane.
- A4. The critical analysis period is weekday peak commute hours because of the highest traffic volumes occur at these times. It is acknowledged that the proposed cardroom would generate its peak level of activity, and traffic, on weekends. Weekend traffic and weekday evening/night traffic, however, are typically (not holiday shopping times) lower, and therefore, the addition of increased casino traffic on weekends would not be expected to produce the highest total traffic volumes at areawide intersections. For this reason, the EIR evaluated traffic conditions during the weekday a.m. and p.m. peak hours.

II. Written Comments and Responses - Agency

- A5. This recommendation is noted. The Town will consider the recommendation when developing conditions of approval for the selected project. This comment does not directly address the adequacy of the EIR. No further response is required. ✓
- A6. Comment noted. This process will be followed should any work be performed within the State right-of-way.



Department of Economic
and Community Development

PLANNING DIVISION
415/877-8535
FAX 871-7318

January 12, 1994

Malcolm Carpenter
Planning Department
1198 El Camino Real
Colma, CA 94104

Re: Colma Cardrooms DEIR

Mr. Carpenter:

The City of South San Francisco has reviewed the DEIR for several cardrooms at various locations in the Town of Colma.

As stated in the letter of July 9, 1994 South San Francisco will be a responsible agency for purposes of review. We question the appropriateness of the Town of Colma being the lead agency for site #E given that the parking lot will located in the City of South San Francisco. Our jurisdiction will experience circulation and traffic impacts and calls for police service (since most security problems tend to occur in the parking lot).

B1

We observe that site #E is now listed as an alternative in the DEIR. Please clarify the significance. It was not possible to evaluate the impacts of this alternative because the information was incomplete. Please provide more information akin to that provided for the other cardrooms.

B2

As requested in our July 9, 1993 letter in response to the NOP, we would like to have a briefing, so that we may more fully understand the project and provide appropriate comments.

Thank you for the opportunity to comment on the DEIR. If you have any questions, please contact me at 877-8535.

Date: January 12, 1994
To: Malcolm C. Carpenter
Re: Colma Cardrooms DEIR

Page 2

Sincerely,



Steve Carlson, Senior Planner

Attachments: City of South San Francisco Staff Comments

South San Francisco DEIR Comments

- | | |
|---|----------------|
| 1. A portion of site #E is within to the City of South San Francisco. Also, apparently, the Hickey Boulevard Extension project will necessitate acquiring a portion of the site and widening of Mission Road for an estimated couple hundred feet. This information should be included in the environmental review. | B3 |
| 2. Provide dimensioned plans for alternative #E, including the site plans, building elevations and floor plans of all proposed structures. The site plan should include the parking lot layout and landscape plan. | B4 |
| 3. The DEIR should include an assessment of other site alternatives. | |
| 4. Based on field observation site #E consists of fill which appears to contain debris. Because the site has apparently been an uncontrolled fill and presumably without benefit of City approval, the soil should be assessed for contaminants including toxic and/or hazardous material. According to the DEIR, the site contains vegetation indicative of wetlands. A wetland delineation by the Corps of Engineers (COE) appears in order to determine the extent and value of the wetland. Such a determination should be made a mitigation measure and to occur prior to development. Additionally the COE and State Department of Fish and Game should be added to the reviewing agencies. | B5
B6
B7 |
| 5. Construction impacts for each cardroom and the alternative should be delineated including soil haul routes, hours of operation, duration, and noise effects. | B8 |
| 6. Because site #E is near the El Camino Real High School and has a pedestrian easement the South San Francisco Unified School District should be consulted. The location of the buildings and possible fencing could narrow the view of the walkway from the public right-of-way and could create a haven for crime. | B9 |
| 7. The proposed projects will create potentially adverse traffic impacts especially on the Mission Road site and the off-site parking lot on El Camino Real. The circulation impacts are of special concern because they will affect South San Francisco. | B10 |
| A traffic study should be required for all the proposed project to assess the traffic and circulation impacts both on-site and off-site and to pedestrian safety. | B11 |
| The traffic analysis for site #E should include pedestrian safety, should incorporate relevant portions of the Hickey Boulevard Extension EIR, an analysis of turning movements on Mission Road in the project vicinity, on-site circulation, project driveway sight-line distance, projected cumulative development contributing to traffic volumes on Mission Road and the widening of Mission Road. Recommendations should be included in the traffic study to mitigate the traffic impacts. | B12 |

8. The mitigation of archaeological resources should require that a qualified Archaeologist should be required review the construction plans and prepare a report including recommendations to protect potential resources. A common requirement would include that the archaeologist be present on site during any grading or foundation work to evaluate any finds and that a final report be prepared regarding the construction and site assessment. Reliance on an untrained contractor to recognize is questionable if the resource is to be protected and the mitigation measure to be effective.

B13

9. Adverse social impacts to surrounding communities of gambling should be analyzed including gambling addiction and criminal activities.

B14

10. Alternative #E is not viewed favorably by our jurisdiction because of the close proximity to El Camino Real High School. Significant adverse impacts to the Police services would occur in relation to overflow parking onto adjacent properties and streets, traffic congestion, increased crime related calls-for-service, jurisdictional policing problems, conflicts with our municipal code and general plan and adverse design impacts on the Hickey Boulevard extension.

B15

11. We are concerned that the DEIR states that housing effects in our jurisdiction would not be significant without providing the factual basis on which this assertion is based. We are especially concerned that our community along with Daly City are apparently singled out to bear the burden of the housing impacts. The DEIR notes that the majority of employees in the cardrooms would be low income households. Please note that the type of housing being constructed in South San Francisco is middle to upper middle income priced housing. The facts and conclusions regarding South San Francisco housing in the DEIR are questionable without a much greater level of analysis. For example the city has approved only a total of approximately 460 units and all of these are stalled projects that are not likely to be restarted or completed in the near future. The housing study should be expanded to explain that what vacancy rates are necessary in that a housing market is functioning adequately, determine size of households and unit sizes needed to meet this demand, the type of housing needed by these future employees the number, location, vacancy rates for this sub-market, and price of these units. These dwelling units may be in very short supply; consequently, the impact may be understated. The proposed mitigation measures should be more specific as to timing and the type and amount of housing projected to be produced.

B16

12. The South San Francisco Sewage Treatment Plant is currently treating approximately 7.6 MGD. The preliminary reports of a plant capacity study has tentatively determined it's capacity to be in the range of 8-9 MGD. The final capacity study is underway and is due out in March-April 1994. The DEIR should be revised to include this information.

B17

CITY OF SOUTH SAN FRANCISCO INTER-OFFICE MEMORANDUM

Date: January 18, 1994

TO: Steve Carlson, Senior Planner

FROM: Dennis Chuck, Associate Civil Engineer *DNC*

SUBJECT: Colma Card Room

I have reviewed the subject Environmental Document and have the following comments,

1. The traffic counts were taken on a Tuesday through Thursday period, A full five-day work week would more adequately show the traffic characteristics of the intersections. **B18**
2. Concerning Project Trip Generation, what is the assumed percentage of patrons and employees who would utilize public transportation. **B19**
3. Concerning Project Trip Distribution, what are the limits of the core market area in terms of distance of travel. **B20**
4. In your report the future traffic volumes are increased by one percent instead of two percent. The footnote seems to conflict with the referenced sentence. **B21**

CITY OF SOUTH SAN FRANCISCO

Response

- B1. The project sites under consideration by the Town of Colma (Sites A, B, C & D) are all located within the Town. It is therefore appropriate for the Town to be the Lead Agency, since it will have permitting authority for these sites.
- B2. As stated on page V-1 of the DEIR, Site E was originally submitted to the Town as a potential project, but was later withdrawn. Since Site E was once considered a potential project, it was included in the the EIR as it met the criteria for a project alternative under Section 15126 (d) of the CEQA Guidelines. Consistent with CEQA, the potential impacts of developing Site E were considered relative (or in comparison) to the potential environmental impacts of the alternative project sites (Sites A, B, C & D) under consideration for approval by the Town of Colma. Since Site E was included in the EIR as an alternative and not as a project, the description of Site E and the analysis of the impacts of the potential environmental impacts that may be associated with that site are at a less detailed level than for the project sites, consistent with Section 15126 (d) of the CEQA Guidelines.
- B3. Comment noted. Please see response to B2.
- B4. Comment noted. Please see response to B2.
- B5. The comment is noted. It may be true that Site E conatins fill and debris. It is possible that there might be hazardous or toxic contaminants in this debris. Therefore, the following text is added to the second paragraph of the discussion of Site E in the Geology Section of the DEIR, and to the first paragraph of the Hydrology Section discussion:
- "Site E contains fill that appears to contain debris. It is not known what the source of type of debris here consists of. Should Site E be reconsidered as the location for the Colma Cardroom, an evaluation of the soil should be done to determine if any unknown hazardous or toxic materials exist whose source is the above-mentioned debris."
- B6. Comment noted. Please see response to B2.

II. Written Comments and Responses - Agency

B7. Comment noted. Please see response to B2. This mitigation measure has been identified for the project sites under consideration by the Town. Mitigation measures are not developed specifically for alternatives since their impacts are compared to the project, and they are not under consideration for approval.

B8. Construction operational hours and noise impacts are discussed under impact 1 for each of the sites in the noise section of the DEIR, beginning on Page 4.K-9. Mitigation recommended for identified impacts includes requiring construction contractors to limit noisy construction activities to the least noise-sensitive times (8:00 a.m. to 5:00 p.m., Monday through Friday). The Site E Alternative is not located near sensitive receptors and construction noise is not anticipated to be a significant impact at this site.

Duration of the construction period depends on the extent of construction proposed for each site. Construction periods estimated by each project sponsor were 21 months for Site A, 6 to 9 months for Site B, and 9 months for Site D. ~~No construction period was estimated for Site C by the sponsor, but based upon the degree of construction proposed and the estimates of the other sponsor, would probably be 9 months or less.~~

Refer to p III-2
Table III.1

Soil haul routes would vary for each site. Routes would use major arterials and approach from Hillside Boulevard for Site A, and from Hillside Boulevard, Serramonte Boulevard, and El Camino Real for Sites B, C, and D respectively. These three roadways are designated as major highways and intermittent soil haul trips are not expected to appreciably alter the noise environment during designated construction hours.

B9. Comment noted. On page V.10, under the Public Services and Utilities heading, the DEIR states that "Site E is in close proximity to a public High School and a residential neighborhood and would present additional security problems to the Colma Police Department."

B10. Comment noted. Please see response to B2.

B11. Comment noted. Please see response to B2.

B12. Comment noted. Please see response to B2.

- B13. The cardroom project at Site E is more similar to the proposed cardroom project at Site D than Site C since the cardroom project at Site D would involve earthmoving activities and the cardroom project at Site C would involve renovation of an existing building with minimal earthmoving activities. Therefore, the second sentence of the first paragraph on page V-9 has been modified to read:

"The impact to unknown prehistoric cultural resources during construction activities at Site E would be the same as that described for Site D."

To ensure that any previously unknown prehistoric archaeological resources are protected, Mitigation Measure H.D-1 on pages IV.H-7 and IV.H-8 has been modified to read:

"Mitigation Measure H.D-1: Prior to excavation and construction, the prime construction contractor and any subcontractor(s) would be cautioned on the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the project site. In the event that any prehistoric and/or historic cultural resources are accidentally discovered during construction activities, all work within 100 feet of the resources shall be halted and the cardroom developer will consult a qualified archaeologist to assess the significance of the find. If the find is determined to be an important prehistoric cultural resource, the project's schedule will be altered and the cardroom developer will that assure either "in situ" preservation or salvage excavation will be accomplished.

New

- B14. Comment noted. According to Section 15131 of the CEQA Guidelines, economic and social impacts need only be analyzed in an EIR if they would result in physical changes to the environment. In that respect, the EIR has included an analysis on potential housing impacts that may result from any the potential projects. However, it is not expected that the potential for gambling addiction would result in physical changes to the environment. The Public Services section of the DEIR related to Police Services discusses the potential for additional criminal activities and identifies mitigation measures.
- B15. Comment noted. Alternative E was not considered as a potential project site. See Response to Comment B2. Section V of the DEIR (pages V.5 -V10), discusses the potential environmental impacts that may be associated with Site E.

B16. As described in the DEIR (see p. IV.F.7-9) it was not assumed that every cardroom employee would generate a demand for housing. Some jobs would be expected to be filled by residents in the Town, and some would also be expected to be filled by persons already living in the general area. Any increased housing demand outside of Colma would be expected to be absorbed by several communities, and therefore not significant.

B17. The comment is noted. The following text should be added to the Hydrology Section under "Applicable Regulations - Water Quality", following the last paragraph:

"The South San Francisco Sewage Treatment Plant currently treats approximately 7.6 million gallons daily (MGD). The preliminary reports of a plant capacity study by the City of South San Francisco have determined the capacity to be in the range of 8 to 9 MGD. A final capacity study is underway and should be completed by March or April 1994."

B18. Analyses of traffic impacts for environmental review are conducted under representative average traffic conditions. Traditionally, traffic volumes on midweek days (Tuesday to Thursday) are used to present average conditions, with Mondays and Fridays experiencing traffic volumes with more variations, thus not average conditions.

B19. No estimate was made of the number of patrons that would use transit. As described on pages IV.I-16 and IV.I-17 of the DEIR, trip generation estimates were limited to vehicle trips on the basis of surveys conducted at existing cardrooms located in Emeryville and San Bruno during the a.m. and p.m. peak traffic periods (i.e., 7:30 a.m. to 9:00 a.m. and 4:30 p.m. to 6:00 p.m.). People were counted as they entered and exited from the existing facilities, and the number of people in each vehicle that came to the facilities were counted.

B20. Distribution of vehicle trips generated by the proposed Colma cardroom (see Table IV.I.6, page IV.I-18, in the DEIR) was made on the basis of the likely core market areas for cardroom patrons, and a limited number of patrons traveling by private vehicle from longer distances (patrons from greater distances would be expected to be attracted by the availability of bus service provided by the cardroom operator). In general, the project applicants stated that the Northern Peninsula would be the core market area for cardroom patrons. It was therefore assumed for the EIR analysis that the core market would encompass an area from San Francisco to State Route 92. No traffic from the North Bay areas was assumed, and East Bay traffic was expected to be limited because

of The Oaks casino in Emeryville and a new cardroom proposed in San Pablo. In addition, the proximity of BART to Colma and a BART shuttle to/from the cardroom locations would attract East Bay patrons away from auto travel.

- B21. The EIR text states that existing through traffic was increased by one percent per year to reflect growth in regional traffic not associated with project-specific developments. The footnote is an explanation of why a rate of one percent per year was used instead of two percent per year. If no development projects from outside Colma were included in the analysis of cumulative traffic, a growth rate of two percent per year (Colma's usual ambient growth rate) would have been used. Because projects in South San Francisco and Daly City were included, however, it was judged that using a two percent per year growth rate would have overestimated traffic growth on roadways in the study area, and a one percent per year rate was used.

South San Francisco Unified School District

ADMINISTRATION

Dr. Richard J. Rigg
Superintendent

ADMINISTRATION BUILDING, 398 "B" STREET
SOUTH SAN FRANCISCO, CALIFORNIA 94080

(415) 877-8700 Fax - (415) 583-4717

BOARD OF TRUSTEES

Romelo J. Braschi
Shirley Hoch
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January 14, 1994

Mr. Malcolm C. Carpenter
City Planner
Town of Colma
1198 El Camino Real
Colma, California 94014

Dear Mr. Carpenter:

This letter is in response to the Draft Environmental Impact Report (EIR) dated December 1, 1993 for the Proposed Colma Cardroom Project in the Town of Colma.

The EIR analyzes the four cardroom project proposals submitted to the Town of Colma and one alternative project location. The EIR is intended to inform governmental decision-makers and the public about potential significant environmental effects of the proposed project that could occur with implementation.

The Board of Trustees of the South San Francisco Unified School District will address concerns in the following key areas: (1.) Effects on student, staff and community safety, (2.) Land use compatibility and potential impact on school facilities and (3.) Increase in traffic.

(1.) Effects on student, staff and community safety

El Camino High School is located at 1320 Mission Road on the border of the Town of Colma and City of South San Francisco. Other schools that are close to the proposed project areas are Sunshine Gardens Elementary School (1200 Miller Avenue), Hillside Elementary School (1400 Hillside Boulevard) and Parkway Heights Middle School (825 Park Way).

The location of a 24 hour cardroom in close proximity to schools would present additional security problems to the South San Francisco Unified School District. Alternative site "E" on Mission Road is totally unacceptable because of its location just across from El Camino High School.

In the opinion of the Colma Police (Section IV. M - Public Service), the nature of a gambling operation would make the project conducive to illicit activity and related problems of gang activity, robbery and drug activity. The School District does not agree that the mitigation measure reported in the EIR adequately deals with the risks to students and staff of 24 hour gambling near schools.

C1

(2.) Land use compatibility

The EIR does not adequately address the significant potential for vandalism and security problems on District area school sites (Section IV. A - Environmental Setting). The District believes that 24 hour gambling establishments conflict with established educational uses of an area and especially when located close to the border of the City of South San Francisco and El Camino High School. C2

The development of 24 hour gambling will increase the housing demands in South San Francisco (Section IV. F - Housing). The impact on the South San Francisco Unified School District would be "significant" because of the potential for increases in student enrollment and related needs for increased facilities. Also, more employees in the area will increase the demands for child care for employees' children. Area schools are currently operating at capacity. The EIR does not adequately address the impact of additional employees in the area on public school services. C3

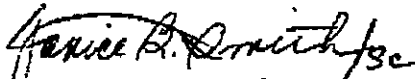
(3.) Increase in traffic (IV. I - Transportation)

The development of cardrooms would add additional vehicle trips to the road network in the surrounding area, increasing the number of vehicles traveling through the area. The mitigations do include improvements in traffic control which would improve traffic flow; however, the District believes that the impact would remain "significant" - not reduced in "less than significant" as reported in the EIR. C4

In summary, the South San Francisco Unified School District's Board of Trustees do not agree that the proposed mitigation measures adequately address the issues of 24 hour gambling on area schools. The District does not have funds to deal with possible demands for additional security and the need for more classroom space to serve the increase in student population resulting from additional employees in the area.

Thank you for the opportunity to respond to the EIR. Please contact the District if I can provide additional information on the responses contained in this letter.

Sincerely,



Vanice B. Smith
Assistant Superintendent/
Business Services

sc

SOUTH SAN FRANCISCO UNIFIED SCHOOL DISTRICT

Response

- C1. On page V.10, under the Public Services and Utilities heading, the DEIR states that "Site E is in close proximity to a public High School and a residential neighborhood and would present additional security problems to the Colma Police Department.". This means that relative to the other project alternatives (sites A, B, C and D), the Site E alternative would create additional demands on the Colma Police Department.. As noted previously, Site E was an alternative that was considered and rejected. Sites A, B, C & D are those that are under consideration for the project. The mitigations related to the additional police services included in section IV.M Public Services and Utilities are not intended to directly address the issues associated with Site E.
- C2. See response to comment B9.
- C3. See response to comment B16.
- C4. The EIR's analysis of the effects of traffic generated by each of the cardroom proposals was conducted on the basis of changes to the level of service (LOS) at 18 intersections in the area surrounding the alternate sites. The concepts of, and analysis methodologies for, level of service are discussed on pages IV.I-6 to IV.I-10 of the DEIR. On the basis of the Significance Criteria established for traffic effects (described on page IV.I-15 of the DEIR), a significant traffic impact was identified, for each proposed site, at the intersection of Serramonte Boulevard and Junipero Serra Boulevard during the p.m. peak hour. At all other study intersections, the proposed cardrooms would either not change the level of service, or the resulting service level would not fall below LOS D, the minimum acceptable LOS. A mitigation measure was identified for the impact at Serramonte / Junipero Serra that would improve the future level of service to LOS D, and on that basis the project impact would be reduced to a less-than-significant level.

COLMA CARDROOM PROJECT

COMMENTS AT 1/12/94 CITY COUNCIL DEIR HEARING

Betty Jane Pinto

The Town of Colma will benefit by the income from a Cardroom. Each of the four applicants has spent a lot of money to submit their proposals and each seems qualified. Can the City Council consider approving all four? Can the applications of the applicants who are not selected remain qualified for possible later approval? D1

NOTE: Some discussion followed these comments. The City Attorney noted that Colma's Ordinance only allows one cardroom with Colma's current residential population. Additional cardrooms would be considered when the population increases. The Council expressed concern that this is a new, untested land use in Colma and they would like to see how one works out before others are approved. It was also noted that the Ordinance could be amended by a vote of Colma's registered voters to modify the regulations applicable to the number of cardrooms that could be in operation relative to the resident population of the Town.

Tom Price

Mr. Price, Site C applicant, said that he thought all of the applicants probably put together their application materials rather quickly in order to meet City deadlines and may not have had time to work out all of the details of their proposals. With respect to off-street parking, for instance, he noted that the original proposal for Site C provided about 600 parking spaces; however, he can commit 900 spaces in order to make sure that City regulations are met. D2

Mr. Price also noted that there is an average number of employees needed to properly operate a cardroom. The average can be obtained by comparing the number of employees to the number of tables for existing, operating clubs. He suggested that some of the other cardroom proposals may not have an accurate estimate of the number of employees that will be needed, and the amount of off-street parking that they propose may therefore be inaccurate. D3

Mr. Price noted that, for Site C, they have offered mitigation for security as part of the project. Built in mitigation includes providing a police sub-station on the Cardroom site and providing a full-time accountant. D4

Mr. Price noted that Site C is already developed. At the time the original construction was done a significant amount of grading was required and numerous truckloads of debris were hauled off. No cultural resources were encountered in the area of the Cardroom proposal, and work necessary to remodel the existing facilities to accommodate a cardroom will not affect any area not already graded for previously completed improvements. D5

Mike Pacelli

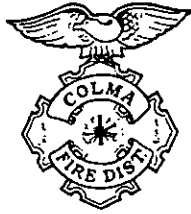
Mayor Ray Boudewyn

II-20

TOWN OF COLMA, COMMENTS ON 1/12/94 PUBLIC HEARING

Response

- D1. This comment does not directly address the adequacy of the EIR. No response is required.
- D2. This comment is acknowledged. The Town will consider the additional parking when developing conditions of approval, should this site be selected ^{as} the preferred project. ✓
- D3. The EIR evaluates the potential environmental impacts of the projects as described in the applications made to the Town. Each cardroom applicant estimated the number of employees needed to operate the facility. The formula established by the Town to determine off-site parking included other factors in addition to number of employees (see p. IV-I-25 of the DEIR). Should these factors change with final design, the off-site parking requirements would also change.
- D4. Comment noted. Please see Mitigations Measures M.C-1 and M.C-3, which, respectively, describe the need to provide additional police and accounting services related to Site C. These mitigations will be incorporated into the project.
- D5. The commenter is correct in noting that the likelihood of disturbing unknown prehistoric archaeological resources at Site C is minimal. However, given the location of Site C, the mitigation measure presented on p. IV.H-7 is warranted to provide guidance to construction contractors should any earthmoving activities be necessary.
- D6. The commenter is correct in that Site D does not directly abut cemetery use. However, Site D does abut a single family residence and this was identified as a conflict with surrounding land use. The impact statement in Table IV.A.2 in changed to state "Development of the project could conflict with surrounding land uses," to encompass all of the impacts considered. CHANGE
→ Nearby used in City table.
- D7. Due to the sensitive nature of prehistoric archaeological resources, the locations of known resources are not made public to minimize the likelihood that disturbance to those resources would occur.



COLMA FIRE DISTRICT

50 REINER STREET
COLMA, CALIFORNIA 94014
Phone (415) PLaza 5-5666



Board of Fire
Commissioners
Geoffrey C. Balton
Martin R. Cortesi
Gary C. Strabian

Fire Chief
Robert V. Benedetti

Fire Marshal
Robert R. Mullins

December 16, 1993

Mr. Malcolm Carpenter
City Planner
Town of Colma
1198 El Camino Real
Colma, CA 94014

Subject: Draft Environmental Impact Report
Colma Cardroom Project
Colma, CA 94014

Dear Mr. Carpenter:

This will acknowledge receipt of the Draft Environmental Impact Report for the subject project. This document may be further identified by date of December 1, 1993, prepared by Environmental Science Associates, Inc.

As the result of our review of this document we offer the following comments that are identified by Section number:

1. (a). Sections: B.A-1, pages I-5 and IV.3-13; B.B-1, pages I-6 and IV.3-16; B.C-1, pages I-8 and IV.3-19; B.D-1, pages I-9 and IV.3-22; Mitigations.

In these sections reference is made to seismic hazards and mitigations and I **E1** quote a portion of the sections:

"Because of fire hazards associated with building collapse during ground shaking, installation of a sprinkler system and a series of fire extinguishers would be required." (Section B.A-1)

"would be required by the Town." (Section B.B-1)

"shall be required by the Town." (Sections B.C-1 and B.D-1)

End of quote. Underlining is mine and refers to differences in the quoted sections.

It should be noted that any seismic action that would result in building or structure collapse would also cause the automatic sprinkler system to be put out of service as such a system would be attached to the building and on collapse would become a part of the rubble. Similarly, fire extinguishers are for use on incipient fires and in a collapsed building or structure would, more than likely, not be accessible or available and they too would become a part of the rubble.

- (b). For the record, automatic sprinkler protection for buildings or structures is required by Section 10.306 (new structures) and Section 10.306.1 (existing) of the Uniform Fire Code as amended and adopted by the Board of Directors of the Colma Fire District and has absolutely nothing what so ever to do with "fire hazards" that may be associated with any building collapse.

E2

II-22

Serving the Unincorporated Areas of:

Broadmoor Village, Garden Village, Sterling Park and the Incorporated Town of Colma

Mr. Malcolm Carpenter
City Planner
Re: Colma Cardroom Project
D.E.I.R.
Colma, CA 94014

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These sections require automatic sprinkler protection in ALL building or structures meeting any of the following requirements:

- A. Buildings having a total floor area of three thousand (3,000) square feet or more; or
- B. Buildings or structures thirty feet (30') or more in height as defined in the Uniform Building Code; or
- C. Buildings or structures three (3) stories or more irrespective of height; Or
- D. All Group H Occupancies; or
- E. All basements or cellars regardless of area; or
- F. Occupancies commonly referred to as Mini-Storage, Mini-Warehouse, Self-Storage.

In the case of the four (4) proposed cardrooms referred to in this D.E.I.R., two (2) are already automatic sprinkler protected (C and D) per the requirements of the above quoted Section 10.306-A.

2. Refer to III Project Description-Site A-Cypress Club:

On page III-7, in the first paragraph it notes that during Phase II they will add 67,000 square feet to the Clubhouse to accomodate 16 additional cardtables. Is this figure (67,000) correct? **E3**

3. (a). Refer to Page III-8, paragraph on Safety Features-Site A:

It is recommended that the first paragraph be amended to read as follows:

"A fire protection system, as required by Section 10.306 of the Uniform Fire Code shall be installed. This automatic sprinkler system shall be in accordance with the requirements of N.F.P.A. Pamphlet No. 13-1989. Such system shall be equipped with a waterflow alarm per Section 2.9 of NFPA No. 13 and Section 10.307 of the Uniform Fire Code. **E4**

Add a paragraph 2 to read as follows:

"Because the distance to the nearest fire hydrant exceeds the maximum distance permitted by the Uniform Fire Code, an on-site water system, equipped with approved fire hydrants, shall be provided in accordance with Section 10.301, in its entirety, as shown in the fire code. This water system to be supplied from the water main on Hillside Blvd. **E5**

(b). Refer to Safety-Site 3-Page III-14:

Change: "Requirements of the Fire Marshal" to "Requirements of the Uniform Fire Code **E6**

(c). Refer to Safety-Site D-Page III-24:

Change: "Requirements of the Fire Marshal" to "Requirements of the Uniform Fire Code **E7**

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4. Refer to Project Objectives-Financial-Site B, Page III-24:

We would recommend that the proposed donation of a Fire Truck mentioned in this paragraph be earmarked for the replacement of the Colma Fire Districts 1950 Aerial Ladder Truck. E8

5. Refer to Page IV.A-5, Site D section:

This section indicates that some parking is projected to be on the roof of the Cardroom Building. Much more information will be needed on this parking proposal. E9

6. (a). Refer to Page IV.M-2, Fire Protection Services:

In this section are comments concerning the I.S.O. rating for Fire Departments. One section in particular I quote as follows:

"The I.S.O. rating could improve if the TOWN were to hire full-time firefighting personnel. (Colma 1987)

This is an oversimplification of a very complex issue and the hiring of full-time firefighting personnel would not necessarily change the I.S.O. rating presently enjoyed by the Fire District. There were items in the grading process that had nothing to do with personnel, either full-time or volunteer, that would also have to be resolved to bring about any possible change from the I.S.O. Class 5 rating.

Also, because full-time vs volunteer personnel was mentioned in the above paragraph and using said personnel as an example we note the following: E10

To provide the same ratio of full-time firefighters as is now provided by our 35 volunteer firefighters, using the I.S.O. grading formula, would require the Fire District to hire nine (9) full-time firefighters. (one for four ratio). It should be noted that this number of full-time personnel would not be available at all times as they would more than likely be working regular shifts, possibly three (3) persons to a shift. This hiring of nine (9) full-time personnel would not effect the I.S.O. rating as it would merely be the equivalent of the present 35 volunteer personnel.

At the present time we get a response of from 12 to 30 of our members to an alarm and these personnel can man three pumper engines, one squad and one aerial ladder truck. Also, ten of our volunteers are certified EMTs with three of these also certified Paramedics.

That is quite a difference to three full-time personnel who could possibly man one pumper engine or possibly the squad.

As to possible costs of providing full-time firefighters, the annual salaries for each one could range from \$36,000.00 to \$48,000.00 and more PLUS benefits. (Medical and other insurance, retirement, EMT and/or Paramedic incentive adjustments to name a few).

For the Colma Fire District to have to do this would require that their present budget be at least doubled which would be impossible given the present tax base and sources of revenue. None of the above figures includes the additional costs of providing each firefighter with all required safety equipment and uniforms.

Mr. Malcolm Carpenter
City Planner
Re: Colma Cardroom Project
D.E.I.R.
Colma, CA 94014

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6. (a). continued

This then becomes a matter of whether or not the taxpayers of the Fire District would be willing to pay the added and continuing costs that would be necessary to correct the items needing correction so as to bring about a possible Class IV rating. It should also be noted that insurance rates for residential occupancies would not change by any I.S.O. rating change, only commercial.

- (b). On Page IV.M-2 in the last paragraph please correct the first line that says the Colma Fire District maintains automatic aid and mutual aid agreements with fire departments

The Colma Fire District does not have automatic aid agreements with any fire departments at the present time. We do belong to the San Mateo County Mutual Aid Program and respond on a predetermined plan to Brisbane, Daly City, Pacifica, San Bruno and South San Francisco, on an assigned basis and to the remainder of San Mateo as a unit of the North San Mateo County Strike Team. We also provide equipment and personnel to areas outside San Mateo County on request from the San Mateo County O.E.S. Coordinator.

E11

7. Refer to Impact, M.A-2; Impact, M.B-2; Impact, M.C-2; Impact, M.D-2:

Notice is made in these items that and I quote:

"Because the minimum water pressure necessary to drive the automatic sprinkler system is 1500 GPM, the project would not be granted a building permit unless that minimum water pressure is provided. (Mullins 1993) (end of quote.)

E12

This is not the information that was provided as GPM and pressure are two different items.

GPM refers to gallons per minute flow and means the number of gallons of water that is provided in one minute. This GPM flow is determined by the available supply the size of the water main and the pressure in PSI.

Pressure is usually given as pounds PSI which means per square inch and denotes the pressure on the water within the container. (Pipe, tank etc)

Appendix III-A of the Uniform Fire Code provides the fire flow requirements for any and all buildings. These requirements are based on the type of construction and the total fire area in square feet.

Table III-A-A of the Uniform Fire Code notes the minimum fire flow required for building in accordance with the items shown above (construction type and square feet) and goes from 1500 GPM up to 8000 GPM. An exception to the above table reads:

"The required fire flow may be reduced up to 75% when the building is provided with an approved automatic sprinkler system but in no case less than 1500 GPM." (end of quote)

As would be noted from the figures above, any fire flow requirement exceeding 6000 GPM could require more than 1500 GPM.

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7. continued

It is noted here that the water supply requirements for automatic sprinkler systems are calculated with the formulas noted in N.F.P.A. Pamphlet No. 13 and take into account the total square foot area of the building, the height or number of stories, the hazard classification of the facility based on the intended use, the number of sprinkler heads to be supplied, the size, GPM flow and water pressure in the street main or supply source etc.

Also, Building Permits are issued by the local Building Department, not the Fire Department.

8. Refer to Pages V-5 and V-6:

This refers to Site E alternative and on Page V-6 makes reference to "Jefferson" High School. I believe this should be El Camino High School.

E13

Of a necessity these comments are limited and general recommendations for this stage of the project. More detailed items will be forthcoming as soon as a final site and building is selected.

We reserve the right to alter, delete or request additional requirements during future plan development or as construction progresses and it should become necessary.

Nothing in this review shall be construed as encompassing structural integrity or as abrogating more restrictive requirements by other agencies having jurisdiction.

In the event you may have any questions or if we can be of further assistance please call us at 415/755-5666.

Very truly yours,



Robert R. Mullins
Fire Marshal-Ass't Chief

cc: Board of Directors-CFD
City Mgr.-Town of Colma
File

TOWN OF COLMA, FIRE DISTRICT

Response

- E1. Comment noted. Mitigation Measure B.A-1, pages I-5 and IV.B-13 should be revised to read as follows:

"The existing building, if not already up to seismic safety design standards of the Uniform Building Code and Uniform Fire Code, shall be brought up to code. Future expansion of the building shall also be done according to Code. ~~Because of fire hazards associated with building collapse during ground shaking,~~ Installation of a sprinkler system and a series of fire extinguishers would be required, as per the Uniform Fire Code."

Mitigation Measure B.B-1, pages I-6 and IV.B-16 should be revised to read as follows:

"The proposed building shall be built according to the seismic safety design standards of the Uniform Building Code and Uniform Fire Code. Future expansion of the building shall also be done according to Code. The building shall be constructed as a wooden light frame or reinforced concrete structure. Such buildings perform well during ground shaking events due to their flexibility (ABAG, 1986). Types of construction to be avoided include unreinforced masonry, concrete, or stucco. However, even buildings designed to meet building code specifications may still collapse during a seismic event. ~~Because of fire hazards associated with building collapse during ground shaking,~~ Installation of a sprinkler system and a series of fire extinguishers would be required, as per the Uniform Fire Code."

Mitigation Measure B.C-1, pages I-8 and IV.B-19 should be revised to read as follows:

"The proposed building shall be expanded and reconfigured according to the seismic safety design standards of the Uniform Building Code and Uniform Fire Code. However, even buildings designed to meet building code specifications may still collapse during a seismic event. ~~Because of fire hazards associated with building collapse during ground shaking,~~ Installation of a sprinkler system and a series of fire extinguishers would be required, as per the Uniform Fire Code."

Mitigation Measure B.D-1, pages I-9 and IV.B-22 should be revised to read as follows:

"The proposed building shall be constructed according to the seismic safety design standards of the Uniform Building Code and Uniform Fire Code. However, even buildings designed to meet building code specifications may still collapse during a seismic event. The building shall be constructed as a wooden light frame or reinforced concrete structure. Such buildings perform well during ground shaking events due to their flexibility (ABAG, 1986). Types of construction to be avoided are unreinforced masonry, concrete, or stucco. ~~Because of fire hazards associated with building collapse during ground shaking,~~ Installation of a sprinkler system and a series of fire extinguishers would be required, as per the Uniform Fire Code."

E2. Comment noted. Please see response to comment E2.

E3. Comment noted. On page III-7, the first paragraph should be revised to read as follows:

A two-phased work plan is proposed. Phase one would take place between the summer of 1993 and the winter of 1994. It would include the remodeling of the existing club house into a 24-table cardroom, cocktail lounge and a snack bar, the development of two new parking lots (177 spaces and 47 spaces), and the installation of additional landscaping, irrigation, lighting and signage, a loading dock, and retaining wall. The pro shop would be moved to the north end of the existing parking lot. Phase two would take place in the summer of 1995 and would add 67,000 square feet to the club house (for 16 additional card tables), and a 150-space parking lot.

E4. Comment noted. On page III-8, the first paragraph should be revised as follows:

"A fire protection system, as required by Section 10.306 of the Uniform Fire Code shall be installed. This automatic sprinkler system shall be in accordance with the requirements of N.F.P.A. Pamphlet NO. 13-1989. Such system shall be equipped with a waterflow alarm per Section 2.9 of NFPA No. 13 and Section 10.307 of the Uniform Fire Code. ~~based on the 1991 Fire Safety Code, would be installed. The system would include fire sprinkler heads every 10 feet in both directions throughout the building. A fire department inlet connection in which the fire department can pump water into a standpipe system or sprinkler system would be installed. A backflow valve would be installed in conjunction with the fire department connection. Pull stations would be visible from all gaming area spaces. The fire protection system would include a 24-hour monitoring system that notifies the fire department upon activation."~~

Revise
text

- E5. Comment noted. On page III.8, the following paragraph should be added following the first paragraph on that page:

"Because the distance to the nearest fire hydrant exceeds the maximum distance permitted by the Uniform Code, an on-site water system, equipped with approved fire hydrants, shall be provided in accordance with Section 10.301, in its entirety, as shown in the fire code. This water system to be supplied from the water main on Hillside Blvd."

Add to text.

- E6. Comment noted. On page III.14, the second sentence of the first paragraph under the "Safety - Site B" heading should be revised as follows:

"The building would also be equipped with an approved sprinkler system per the requirements of the Uniform Fire Code Fire Marshal."

Change text

- E7. Comment noted. On page III.24, the first sentence of the first paragraph under the "Safety - Site B" heading should be revised as follows:

"The cardroom would be fitted with appropriate fire safety equipment meeting all specifications and regulations of the Uniform Building Code and the Uniform Fire Code Fire Marshal."

Change text

- E8. Comment noted. On page III-24, the last paragraph should be revised as follows:

See to p. III-28

"The applicant expects gross revenue from the project to be approximately \$15.5 million the first year of operation, \$23 million the second year and \$26.7 million the third year. Expected tax revenue to the Town of Colma would subsequently be approximately \$1.45 million the first year, \$1.8 million the second year and \$3.5 million the third year. The proposed project would also donate a fire truck and two police patrol cars to the Town of Colma after two years of profitable operations. The donated fire truck should be earmarked for replacement of the Colma Fire District's 1950 Aerial Ladder Truck. -The project would be expected to create 350 new jobs. Colma residents would have first priority to the employment opportunities. A free shuttle service to and from work would be available to Colma residents employed by the project. See Table III-4 for a comparison of projected revenues among the proposed sites and other cardroom facilities."

Add to text

- E9. Comment noted. The second and third sentences in the fifth paragraph on page IV.A-5 have been revised to read (old text is ~~lined through~~, new text is double underlined):

"Parking would be located adjacent to and on the roof of the cardroom building. The adjacent parking would be on the approximately 80 foot wide strip. Views of the rooftop parking would be shielded through the use of high cardroom walls.

Add to text.

Additional parking for patrons would be located on an adjoining 1.6-acre parcel to be leased from the San Francisco Water Company."

- E10. Comment noted. On page IV.M-2, the last sentence of the first paragraph under "Fire Protection Services" should be deleted and the paragraph should read as follows:

"The Colma Fire Protection District is comprised of 35 volunteer firefighters and a part-time Fire Marshal - Assistant Chief. The District responds to calls within the Town limits as well as to some surrounding areas of unincorporated San Mateo County. The District Fire Station is located north of the Town near San Pedro Road at Reiner and Mission Streets. Given the Town's 1990 population, this represents a service ratio of approximately one volunteer firefighter for every 22 residents. The District operates four engines and ancillary equipment: three 1,500-gallon per minute capacity engines; one 1,000-gallon per minute capacity reserve engine; one ladder truck with a 75-foot aerial ladder; and, one squad car (Mullins, 1993). Average response time to calls for service in the Town is three to five minutes. Colma's fire protection services are rated a "V" on the I - X (best to worst) Insurance Service Office (ISO) scale. The ISO rating is based on available water supply, manpower and equipment and is used to establish fire insurance rates paid by local residents and businesses. ~~The ISO rating could improve if the Town were to hire full-time fire fighting personnel (Colma, 1987).~~"

- E11. Comment noted. On page IV.M-2, the second paragraph under the "Fire Protection Services" heading should be revised as follows:

~~"The Colma Fire Protection District maintains automatic aid and mutual aid agreements with the fire departments of the North County Division of the San Mateo County, Daly City, South San Francisco, and Brisbane. The Colma Fire District belongs to the San Mateo County Mutual Aid Program and responds to pre-determined plan to Brisbane, Daly City, Pacifica, San Bruno and South San Francisco on an assigned basis, and to the remainder of San Mateo as unit of the North San Mateo County Strike Team. The Colma Fire District also provides equipment and personnel to areas outside San Mateo County on request from the San Mateo County O.E.S. Coordinator. Automatic aid agreements These mutual aid programs provide for an automatic response to structural fires in areas immediately adjacent to the jurisdiction's boundary. Mutual aid agreements provide service anywhere in the neighboring jurisdiction when that assistance is specifically requested. Fire protection services to the San Bruno Mountain Park, which is immediately north and east of Colma, is provided by the California Division of Forestry. The Colma General Plan recommends that if the need for a future station arises (either through dissolution of the existing fire District or station, or if an additional branch station is desired), the Town should locate it on Hillside Boulevard in the vicinity of Serramonte Boulevard (Colma, 1987)."~~

- E12. Comment noted. The last sentence of the first paragraph under impact M.A-2 on page IV.M-12, impact M.B-2 on page IV.M-17, impact M.C-2 on page IV.M-22, and impact M.D-2 on page IV.M-26 should read as follows:

"The proposed project would be subject to design review and approval by the Colma Fire Protection District before any project approval may be granted by the Town. Design review would ensure compliance with all local and regional safety and fire codes, and would allow the District to make specific design recommendations to maximize the safety features of the project. The proposed project would also be required to maintain a fire-sprinkler system pursuant with local fire codes. (Mullins, 1993) According to Appendix III-A of the Uniform Fire Code, minimum fire flow required for a building depend on the type of construction and the total square footage of the fire area. Required fire flow may range from 1,500 to 8,000 gallons per minute." ~~Because the minimum water pressure necessary to drive the sprinkler system is 1,500 gallons-per-minute, the project would not be granted a building permit unless that minimum water pressure is provided.~~

revise
text